

**BACKUS | BURDEN**  
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 Attorneys for Defendants  
*The Vons Companies, Inc*  
*and Safeway, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MARIA SHAW,	)	Case No.	2:24-cv-00132-RFB-DJA
	)		
Plaintiff,	)		
vs.	)		
	)	<b>MOTION TO REMOVE</b>	
THE VONS COMPANIES, INC., a foreign	)	<b>DALLIN KNECHT, ESQ.</b>	
corporation, dba VONS, SAFEWAY, INC., a	)	<b>AS COUNSEL OF RECORD</b>	
Foreign Corporation; DOES I through X; and	)	<b>FOR DEFENDANTS</b>	
ROE CORPORATIONS I through X, inclusive,	)	<b>THE VONS COMPANIES, INC. and</b>	
	)	<b>SAFEWAY, INC</b>	
Defendants.	)		

**TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that Defendants, THE VONS COMPANIES, INC. and SAFEWAY, INC., by and through their counsel of record, JACK P. BURDEN, ESQ. and JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN hereby provide notice that DALLIN KNECHT, ESQ. is no longer affiliated with the law firm of BACKUS | BURDEN and thus will no longer be associated as counsel of record for that Defendants THE VONS COMPANIES, INC. and SAFEWAY, INC in this matter.

As such, Defendants THE VONS COMPANIES, INC. and SAFEWAY, INC respectfully move this Honorable Court for an Order removing DALLIN KNECHT, ESQ. as counsel of record

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1 in this matter with all parties to update their respective service lists, accordingly.

2 JACK P. BURDEN, ESQ. and JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN  
3 will continue to serve as counsel of record for Defendants. THE VONS COMPANIES, INC. and  
4 SAFEWAY, INC in this action.

5 All items including, but not limited to, pleadings, papers, correspondence, documents, and  
6 future notices in this action shall continue to be directed to, and served on JACK P. BURDEN,  
7 ESQ. and JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN as counsel of record for the  
8 Defendants, THE VONS COMPANIES, INC. and SAFEWAY, INC.  
9

10 DATED this 29<sup>th</sup> day of May, 2024.

11 Respectfully Submitted,  
12 **BACKUS | BURDEN**

13 By: /s/ Jack P. Burden  
14 Jack P. Burden, Esq.  
15 Jacquelyn Franco, Esq.  
16 3050 South Durango Drive  
17 Las Vegas, NV 89117  
18 *Attorneys for Defendant*  
*The Vons Companies, Inc.*  
*and Safeway, Inc*

19 **IT IS SO ORDERED.**

20 DATED: 5/30/2024

21   
22 \_\_\_\_\_  
23 DANIEL J. ALBREGTS  
24 UNITED STATES MAGISTRATE JUDGE  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I am a resident of and employed in Clark County, Nevada. I am over the age of 18 years and not a party to the within action. My business address is: 3050 South Durango Drive, Las Vegas, Nevada, 89117.

On May 29, 2024, I served this document on the parties listed on the attached service list via one or more of the methods of service described below as indicated next to the name of the served individual or entity by a checked box:

**VIA U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada. I am “readily familiar” with the firm’s practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

**VIA FACSIMILE:** by transmitting to a facsimile machine maintained by the attorney or the party who has filed a written consent for such manner of service.

**BY PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

**BY E-MAIL:** by transmitting a copy of the document in the format to be used for attachments to the electronic-mail address designated by the attorney or the party who has filed a written consent for such manner of service.

**BY ELECTRONIC MEANS:** by electronically filing and serving with the court’s vendor.

I declare that under penalty of perjury under the laws of the State of Nevada that the above is true and correct. I further declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

/s/ Anne Raymundo  
An employee of **BACKUS | BURDEN**

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**SERVICE LIST**

ATTORNEYS OF RECORD	PARTIES REPRESENTED	METHOD OF SERVICE
Marjorie L. Hauf, Esq. Nevada Bar No.: 8111 Matthew G. Pfau, Esq. Nevada Bar No.: 11439 Bre'Ahn Brooks, Esq. Nevada Bar No.: 15672 <b>H&amp;P LAW</b> 710 S 9th Street; Las Vegas, NV 89101 T: 702 598 4529 F: 702 598 3626 mhauf@courtroomproven.com mpfau@courtroomproven.com bbrooks@courtroomproven.com	Attorneys for Plaintiff, <i>Maria Shaw</i>	<input type="checkbox"/> Personal service <input type="checkbox"/> Email service <input type="checkbox"/> Fax service <input type="checkbox"/> Mail service <input checked="" type="checkbox"/> Electronic Means

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